

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

S3G TECHNOLOGY LLC,

Plaintiff,

v.

CHICK-FIL-A, INC.,

Defendant.

Case No. 2:20-CV-114

JURY TRIAL DEMANDED

**PLAINTIFF S3G TECHNOLOGY LLC'S ANSWER TO THE COUNTERCLAIMS OF
DEFENDANT CHICK-FIL-A, INC.**

Plaintiff S3G Technology LLC (“S3G”) hereby responds as follows to the Counterclaims of Defendant Chick-Fil-A, Inc. (“Chick-Fil-A”) asserted in response to S3G’s Complaint for Patent Infringement. S3G expressly denies that Chick-Fil-A is entitled to any relief whatsoever in connection with its Counterclaims, including, but not limited to, all relief requested in the Prayer for Relief in Chick-Fil-A’s Counterclaims.

THE PARTIES

1. Responsive to Counterclaim Paragraph 1, based on information and belief, S3G admits the allegations.
2. Responsive to Counterclaim Paragraph 2, S3G admits the allegations.

JURISDICTION AND VENUE

3. Responsive to Counterclaim Paragraph 3, S3G admits the allegations.
4. Responsive to Counterclaim Paragraph 4, S3G admits that venue is proper in this District.

FIRST COUNTERCLAIM

5. Responsive to Counterclaim Paragraph 5, S3G admits the allegations.
6. Responsive to Counterclaim Paragraph 6, S3G denies the allegations.

SECOND COUNTERCLAIM

7. Responsive to Counterclaim Paragraph 7, S3G admits the allegations.
8. Responsive to Counterclaim Paragraph 8, S3G denies the allegations.

THIRD COUNTERCLAIM

9. Responsive to Counterclaim Paragraph 9, S3G admits the allegations.
10. Responsive to Counterclaim Paragraph 10, S3G denies the allegations.

FOURTH COUNTERCLAIM

11. Responsive to Counterclaim Paragraph 11, S3G admits the allegations.
12. Responsive to Counterclaim Paragraph 12, S3G denies the allegations.

FIFTH COUNTERCLAIM

13. Responsive to Counterclaim Paragraph 13, S3G admits the allegations.
14. Responsive to Counterclaim Paragraph 14, S3G denies the allegations.

SIXTH COUNTERCLAIM

15. Responsive to Counterclaim Paragraph 15, S3G admits the allegations.
16. Responsive to Counterclaim Paragraph 16, S3G denies the allegations.

RELIEF REQUESTED

WHEREFORE, S3G prays that this Court enter judgment against Chick-Fil-A on Chick-Fil-A's Counterclaims as follows:

(a) Dismissing Chick-Fil-A's Counterclaims with prejudice and ordering that Chick-Fil-A is entitled to no recovery whatsoever on its Counterclaims, including without limitation all relief sought in Chick-Fil-A's Prayer for Relief in its Counterclaims;

- (b) Ordering that this is an exceptional case, pursuant to 35 U.S.C. § 285, and
- (c) Awarding S3G its attorney fees and full costs of suit; and
- (d) Awarding S3G such other and further relief as this Court deems just and appropriate.

JURY DEMAND

S3G demands a jury trial on all issues so triable.

DATED: July 21, 2020

Respectfully Submitted,

By: /s/ Gregory S. Cordrey
Stanley M. Gibson
Gregory S. Cordrey
Jessica P.G. Newman
**JEFFER MANGELS BUTLER & MITCHELL
LLP**
1900 Avenue of the Stars, Seventh Floor
Los Angeles, CA 90067
Telephone: (310) 203-8080
Facsimile: (310) 203-0567
E-mail: smg@jmbm.com
E-mail: gxc@jmbm.com
E-mail: jxn@jmbm.com

Charles Ainsworth
State Bar No. 00783521
Robert Christopher Bunt
State Bar No. 00787165
PARKER, BUNT & AINSWORTH, P.C.
100 E. Ferguson, Suite 1114
Tyler, TX 75702
903/531-3535
903/533-9687
E-mail: charley@pbatyler.com
E-mail: rcbunt@pbatyler.com

COUNSEL FOR PLAINTIFF S3G
TECHNOLOGY LLC

CERTIFICATE OF SERVICE

I hereby certify that the following counsel of record, who are deemed to have consented to electronic service are being served this 21st day of July, 2020, with a copy of the document via electronic mail at the email addresses listed immediately below.

Robert L Lee
Emily Chambers Welch
Alston & Bird LLP - Atlanta
One Atlantic Center
1201 West Peachtree Street NW #4900
Atlanta, GA 30309-3424
Email: bob.lee@alston.com
emily.welch@alston.com

Brady Cox
Alston & Bird LLP
2200 Ross Avenue, Suite 2300
Dallas, TX 75201
Email: brady.cox@alston.com

/s/ Gregory S. Cordrey
GREGORY S. CORDREY